

United States Environmental Protection Agency Region 1 – New England 5 Post Office Square, Suite 100 Boston, MA 02109-3912

SEP 2 7 2016

Certified Mail
Returned Receipt Required
EPA ICR No.: 2468.02

OMB Control No.: 2020-0035

Gene Lee, Owner Four-In-One-Company, NPDES Permit No. MAG250954 12 Alpha Road Chelmsford, MA 01824

Re:

Request for Information Pursuant to Section 308 of the Clean

Water Act (33 U.S.C. § 1318), Docket No. CWA-308-R01-FY16-10

Dear Mr. Lee:

On October 22, 2015, the U.S. Environmental Protection Agency (the "EPA") issued a final rule requiring all facilities with permits issued under the National Pollutant Discharge Elimination System ("NPDES") Program to electronically submit NPDES compliance monitoring reports and notices [e.g., Discharge Monitoring Reports ("DMRs")] to their authorized NPDES program [80 Fed. Reg.64063 (October 22, 2015)]. The final rule, which became effective on December 21, 2015, requires that all NPDES regulated entities that are required to submit DMRs must do so electronically by December 21, 2016 (i.e., within one year after the effective date of the final rule).

Therefore, Four-In-One-Company is hereby required, pursuant to Section 308(a) of the Federal Clean Water Act (the "Act"), 33 U.S.C. 1318(a), to respond to this Request for Information (the "Request") within **the time frames indicated in this letter**.

In order to meet the deadline of the NPDES Electronic Reporting Rule, the Four-In-One-Company must take the following actions:

1. Within fourteen (14) days of receipt of this Request, the Four-In-One-Company must have the signatory authority (i.e., the individual(s) who will be signing the DMRs for

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the facility) create an account in NetDMR and submit the original copy of the facility's completed and signed Subscriber Agreement (the document generated online which identifies who will be signing for the facility) to the address identified below for EPA's review and approval. The signatory authority can either be a Responsible Official (i.e., corporate officer or for a municipality a principal executive officer or ranking elected official) or a duly authorized representative. A duly authorized representative will need Responsible Official authorization in the Subscriber Agreement. A copy of the "EPA Region 1 Quick Reference Guide for a Permittee to Create an Account and Request Access Using NetDMR" is provided with this Request to assist your facility in completing this step.

2. Within no later than forty-five (45) days of receiving EPA approval of the Four-In-One-Company's Subscriber Agreement, the facility shall submit its first electronic DMR through the EPA Region 01 – New Hampshire and Massachusetts Regulatory Authority Instance in NetDMR (see https://netdmr.epa.gov/netdmr/public/home.htm). Training on the use of NetDMR can be found by accessing the following link https://netdmr.zendesk.com/entries/44942194-Training-Materials.

Information submitted pursuant to this Request shall be sent by certified mail, and shall be addressed as follows:

United States Environmental Protection Agency, Region I
5 Post Office Square, Suite 100, OES04-4
Boston, MA 02109-3912
Attention: Neil Handler

Thank you for your assistance and timely response to this Request. If you have questions regarding this Request, please contact Neil Handler of my staff at 617-918-1334.

Sincerely,

James Chow, Manager

Technical Enforcement Office

Office of Environmental Stewardship

Enclosures

cc:

Neil Handler, EPA (electronically)
David Ferris, MassDEP (electronically)





EPA Region 1 Quick Reference Guide for a Permittee to Create an Account and Request Access Using NetDMR (For Signatory/Permit Administrator Roles)

Creating an Account Are You Going to the Test or the Live (Production) Website?

If this is your first time using NetDMR, you can start by using the **Test Website** to familiarize yourself with the NetDMR registration, data entry, and submittal processes or you can go directly to the **Live (or Production) Website**.

Test Website - https://netdmrtest.epacdx.net/netdmr-web/public/home.htm

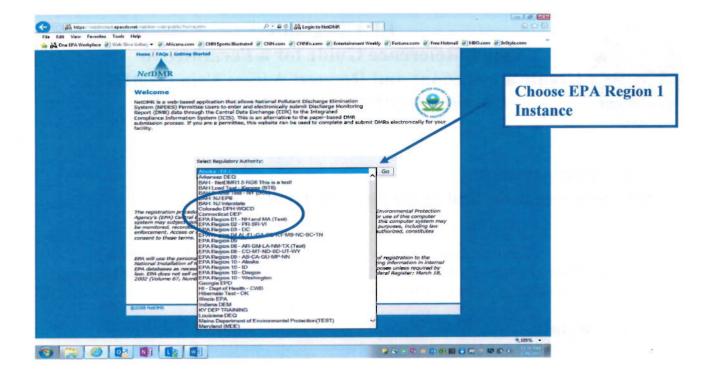
Live (Production) Website- www.epa.gov/netdmr

Please note, that the **first** person creating an account for a facility in NetDMR must have the legal authority (i.e., be the Responsible Official as identified in 40 CFR 122.22) to sign <u>permit applications</u>, reports, and other permit-required submittals (e.g., DMRs) or alternatively be someone who will be authorized/delegated in writing by the Responsible Official to sign DMRs (i.e., the Duly Authorized Official) for the facility. The first person who establishes their account in NetDMR will be identified as the **Signatory** and will also be automatically given the **Permit Administrator**, **Edit** and the **View** Roles.

Note: the **Permit Administrator** will have the responsibility for approving other individuals or outside data providers (such as labs) that will be assisting with NetDMR data entry or management at the facility and requesting either "Edit" or "View" rights. Please see the discussion on page 10 of this guide for more information on the different roles and functions each permittee user type can have in NetDMR.

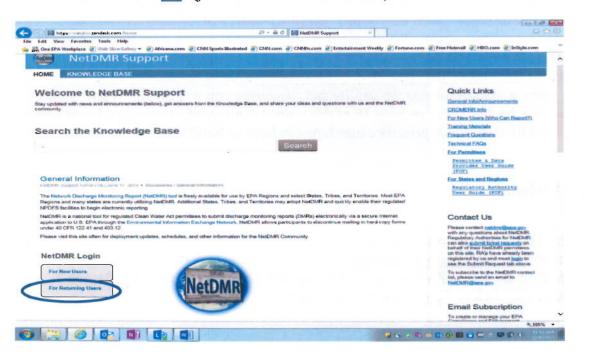
Test Website

At the **Test Website**, you should first see the "**NetDMR Welcome**" page, where you can use the "**Select Regulatory Authority**" pull down menu to choose the appropriate Instance to use (i.e., EPA Region 1 – NH and MA Test). Select the **EPA Region 1** instance and click on "**Go**" (or hit the enter key).



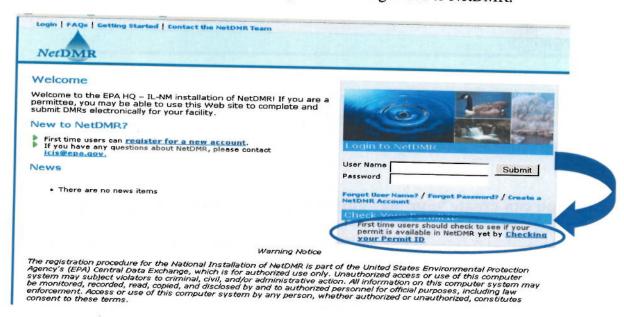
Live (Production) Website

If you go the **Live Website** address, you should see the "**NetDMR Support**" page, where you can click on the NetDMR Login "**For Returning Users**" tab to get you to the "**NetDMR Welcome**" page. Once on the NetDMR Welcome page, click on the "**Select Regulatory Authority**" pull down menu and select the **EPA Region 1** – **NH and MA** instance and click on "**Go**" (just like for the Test Website).



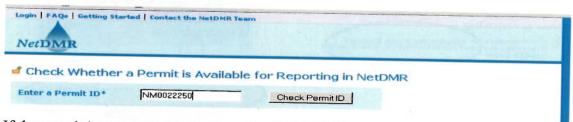
Once you are on the "NetDMR Welcome" Page:

We recommend that you **Check for your Permit Number** prior to creating an account. Most NPDES permits will be available for filing through NetDMR – however, some permits (e.g., Remediation General Permit) are still being added to NetDMR.

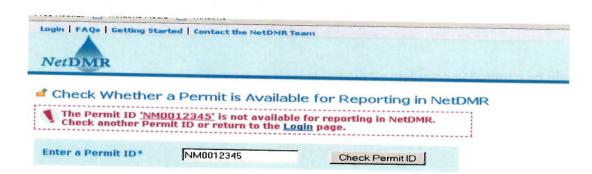


To do this click on the "Checking Your Permit ID" link

Enter a valid 9 digit NPDES Permit ID. Click on "Check Permit ID"



If the permit is **not** available for reporting in NetDMR, a message similar to below will appear.



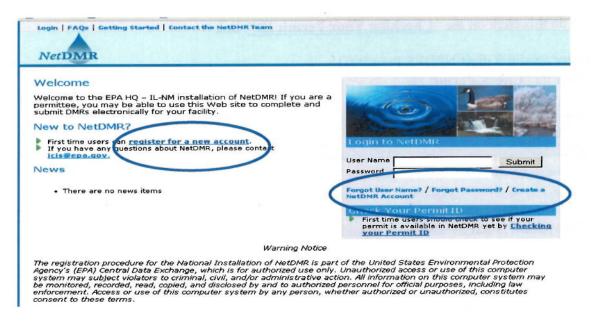
If the permit is available you will receive a confirmation message similar to below.



Now you can create your account on the "NetDMR Welcome" Page

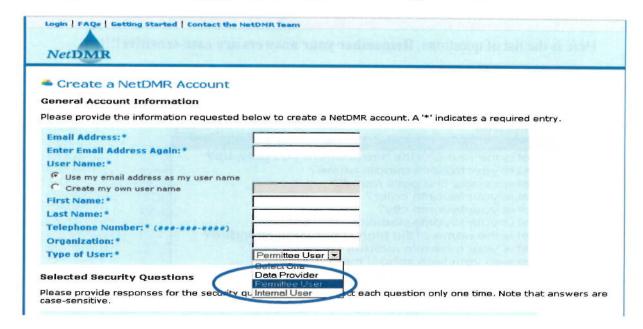
If you checked for your permit, click the "Login" tab on the top of the page to return to the "NetDMR Welcome" page. Once on the "NetDMR Welcome" page:

Click on either "Register for a new Account" or "Create a NetDMR Account"

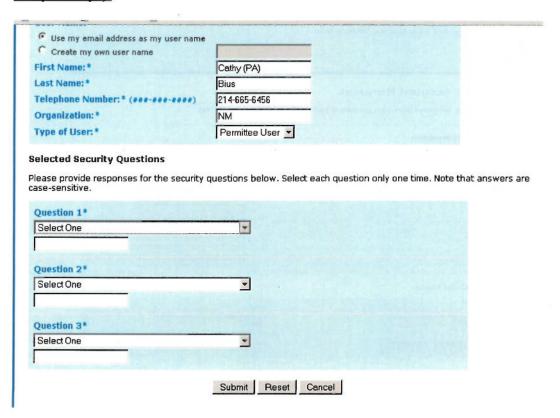


You will be required to complete all the fields with an asterisk.

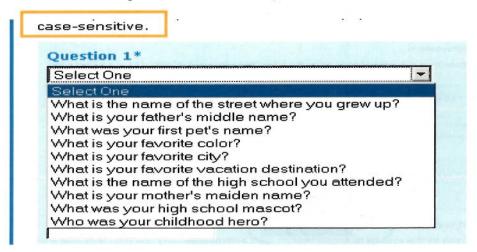
Note: you must select "Permittee User" for the "Type of User".



Next, answer five security questions. Choose from the list of questions and type in your answers. It's important that you remember your answers as you will be asked to respond to one of the questions at several points in the NetDMR process (i.e., to finish the registration process, to electronically sign your DMRs, and to change your password every 90 days).

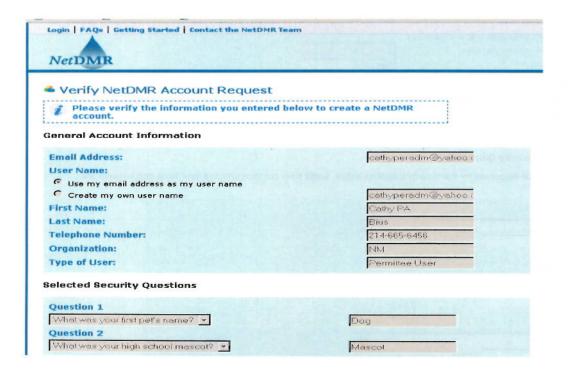


Here is the list of questions. Remember your answers are case-sensitive!!!!

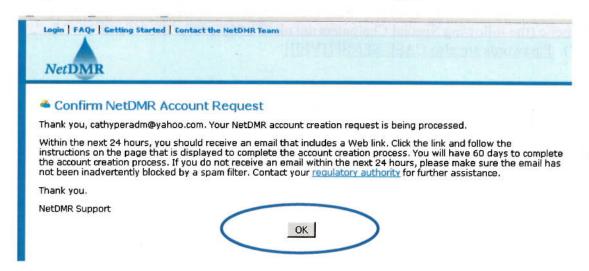


When your done filling in all of the required fields, click "Submit"

Verify your responses displayed in the gray boxes. Make any necessary changes. Click on "Verify".



A NetDMR Account Request message appears stating your request is being processed and you should receive an email within 24 hours. Click "OK"

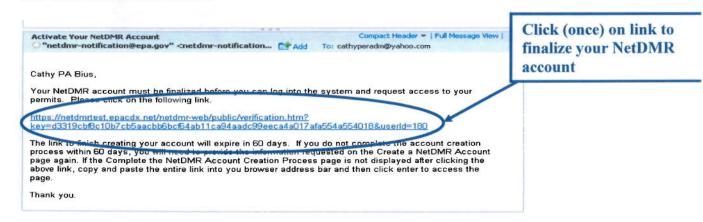


Within the next 24 hours (but typically it's within the next 5-10 minutes) you should receive an email message from "netdmr-notification" (similar to below) that you need to open and read to finalize your account. Note: you will have 60 days to complete the account creation process before the account becomes inactive.

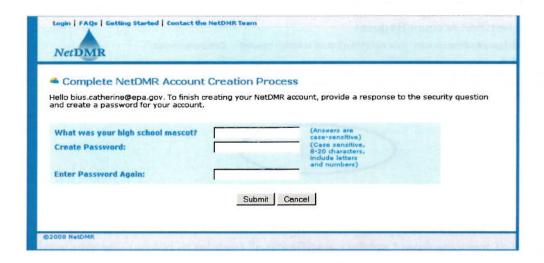
Email - Inbox



Open the email, and click (Important, click only once!) on the link to finalize your NetDMR account. If the link doesn't work, you may need to copy & paste this in your web browser to access the url.

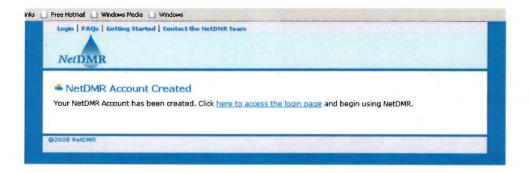


To Complete the NetDMR Account Creation Process, answer the required security question(s) and Create a Password. Passwords can be 8 – 20 characters, alpha & numeric (the following Special Characters are ok "!", "@", "#", "\$", "^", "&","+","=", "*"). Passwords are also CASE SENSITIVE!!!

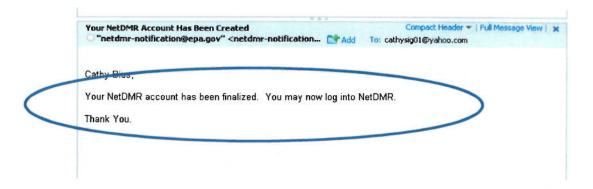


Click "Submit"

You should receive the following message: "Your NetDMR Account has been created. Click here to access the login page and begin using NetDMR".



Congratulations !!! You have now successfully created your NetDMR account. You should shortly receive another email from "netdmr-notification" stating that your account has been finalized.



The next step is for the primary NetDMR user(s) (the individual(s) who will be identified as the Signatory/Permit Administrator Role) to "Request Access" to the permits that they will be using — See Next Page.

REQUESTING ACCESS

How do I decide what roles I will need and who will fill these roles?

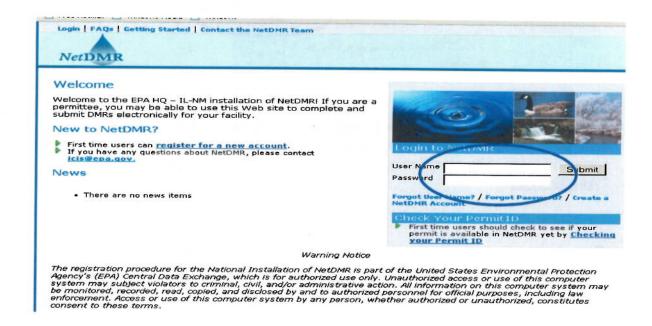
Now that you have created a NetDMR account, the next step is to Request Access to the permits you will be using. You need to think about a couple of things before you do this such as who will be using NetDMR for your facility and what role each person will play in the data entry process. The first person creating an account for NetDMR must be a person that will be signing the DMRs (and will be identified as a Signatory Role). This person can be the Responsible Official (as identified in 40 CFR122.22) with the authority to sign permit applications, reports, and other permit-required submittals or it can be the Duly Authorized Official - someone who has been authorized in writing by the Responsible Official to sign DMRs. The person identified in NetDMR as the Signatory Role (either the Responsible or Duly Authorized Official) will also automatically be given the Permit Administrator, Edit and View Roles. The Permit Administrator will have the responsibility for approving other individuals or outside data providers (such as labs) that will be assisting with NetDMR data entry or management at the facility. These individuals could be given Permit Administrator, Edit, or View roles as shown in the table below. It is the responsibility of the first person identified as the Permit Administrator Role to approve access for these other users.

Permittee User Functions

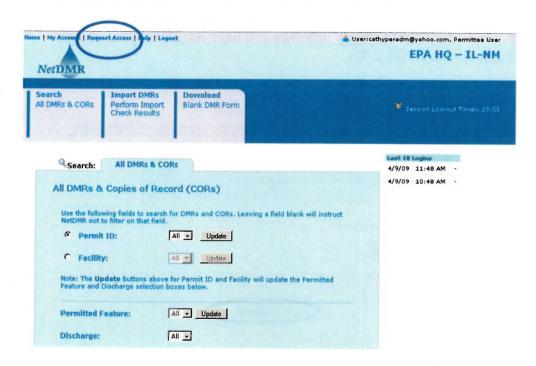
User Type	Manage Access Requests	View DMRs	Download Blank DMRs	Edit / Import / Correct DMRs	Sign and Submit DMRs	Manage CORs	View Permits	View Users	Request Signatory Access	Request Administrator Access	Request Edit Access
View	17-7 19-1							No. of London			
Edit								Market .			
Signatory							THE REAL PROPERTY.	TO THE			
Signatory & Permit Administrator											
Permit Administrator & Edit											
Permit Administrator & View											

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To begin the process to **Request Access** to your specific permit go back to the "**NetDMR Welcome**" page (either the test website or production website addresses noted on page 1 of this reference guide) and after selecting the correct instance for **EPA Region 1 – NH and MA**, Log In to NetDMR using your "**User Name**" and "**Password**".



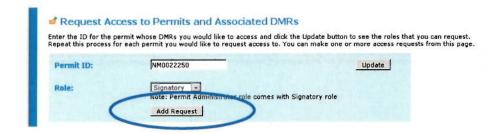
After you have logged in, click on the "Request Access" tab located in the top left corner of the page



Enter the 9 digit NPDES Permit ID and click the "<u>Update</u>" tab to see what roles are available for the permit selected.

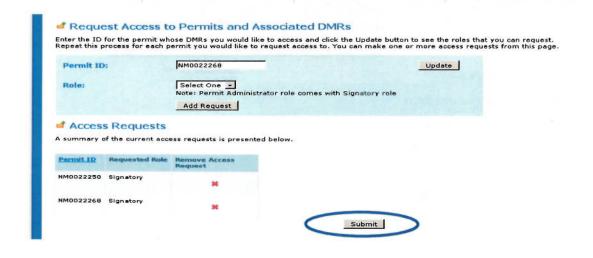


Select the appropriate user role for yourself from the "Role" drop down menu. Remember the first person creating an account must select (and have the authority) to be identified as the "Signatory" role. After you have identified the appropriate role click "Add Request".



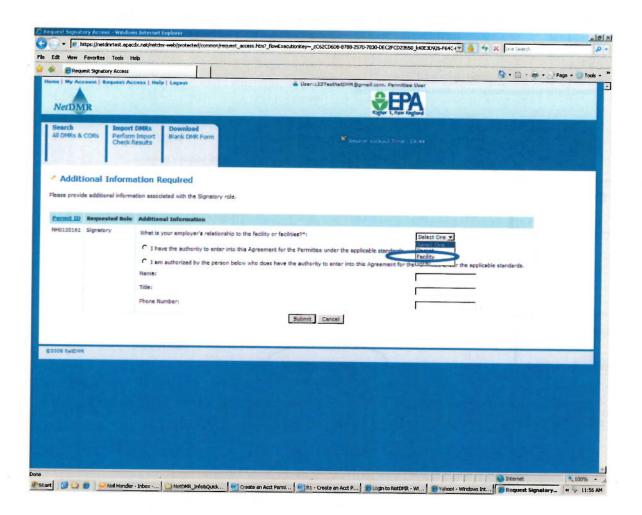
Note: Until the first Signatory privilege is granted for a permit, no other user can be granted read/edit privileges for the permit.

A list of the permits you have requested access for will appear in the "Access Requests" section. You can request to "remove access" by checking on the red X. It's very important that you click on the "Submit" tab once you have completed your access request for all appropriate NPDES IDs.



You will then be prompted in the next screen to provide additional information related to your **Signatory Role**.

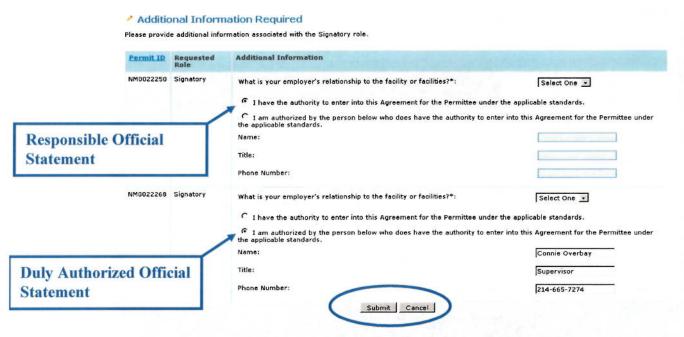
The first question you must answer has to do with your relationship to the facility or facilities. The correct answer for most facilities when you click on the "Select One" pull down menu for this question is "Facility".



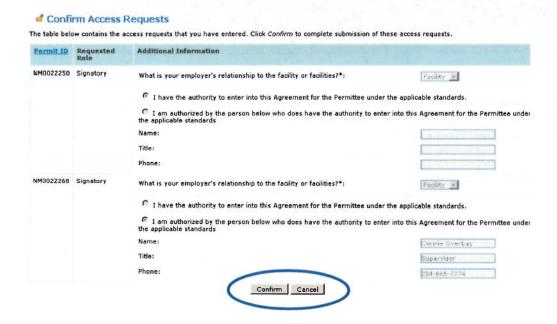
Next you must answer the question on how you derive your Signatory Authority. If you are a **Responsible Official** (for a Corporation this means that you are a Corporate Officer such as a president, secretary, treasurer or facility manager or for a Municipality you are a principal executive officer or ranking elected official) **who can sign NPDES permit renewal applications** and DMRs then you need to select the first button which states "I have the authority to enter into this Agreement for the Permittee under the applicable standards".

If you are a **Duly Authorized Official** – in other words you are being authorized by the Responsible Official to sign the DMRs for your facility then you need to select the second button which states "I am authorized by the person below who does have the authority to enter into this Agreement for the Permittee under the applicable standards". If you select the second button you will also need to fill in the Name, Title, and Phone Number of the Responsible Official who is giving you the Authority to sign the DMRs.

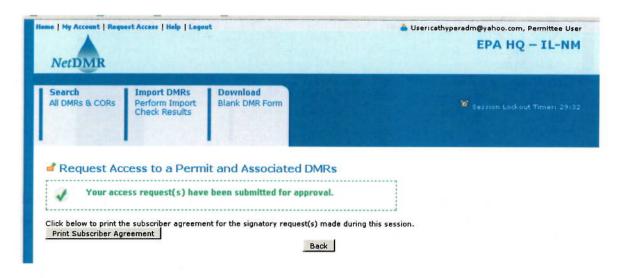
Once you've answered all of the questions and filled in the appropriate information, click "Submit"



You will be asked to confirm the information submitted and shown in gray. Make any necessary changes and if the responses are correct Click "Confirm



At this point your **Access Request** has been submitted **for approval** to the Regulatory Administrator at EPA Region 1 and you will need to wait approval before you can access your electronic DMRs in NetDMR.



Please print out a copy of the subscriber agreement, fill the agreement out, sign it, and mail the original agreement back to the following address at EPA (Fax'd copies of the agreement are not acceptable!!!):

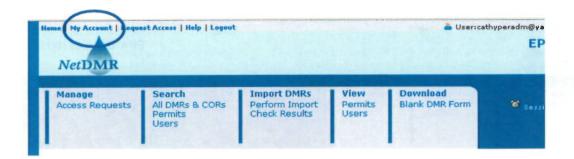
EPA Region 1 Attn: Neil Handler (OES04-4) 5 Post Office Square, Suite 100 Boston, MA 02109-3912

If there are multiple people at your facility that have signatory authority then each one will need to complete and submit a separate Subscriber Agreement to EPA. All Signatory Requests submitted by a facility will need to be approved by EPA prior to your entry of data into NetDMR.

You will receive a confirmation email from "netdmr-notfication" letting you know when your Access Request has been approved by EPA.



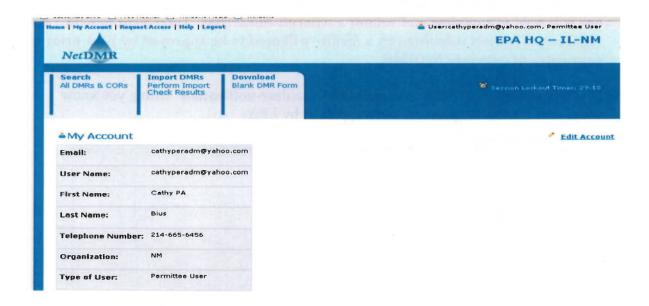
You can view and confirm that you have been given the "Signatory" rights by accessing "My Account" after Log In to NetDMR.

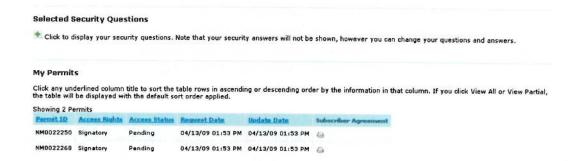


If you scroll down to the "My Permits" section you can view the types of access granted to you for each NPDES Permits under the "Access Rights" column. You are also able to access the Subscriber Agreement from this screen.



You can also view account information, view selected security questions, and view any pending access requests under the "My Account" tab.

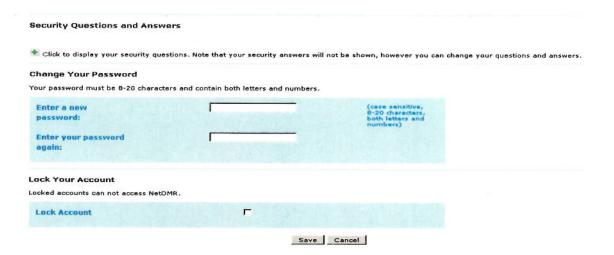




If you need to edit any of the information shown in this section click on the "Edit Account" tab



Along with basic information about your account, you will be able to change the security questions and/or answers and change your password. Please note that the **Lock Your Account** tab is only to be used when you believe your account may have been compromised or you no longer are planning to use NetDMR. Once this option has been selected your account can only be reopened by an EPA System Administrator.



Once you receive your "Access Request Notification" approval email you are now ready to enter data into NetDMR and can also allow others to create and finalize their accounts and request access to your permit. The individual identified as the Permit Administrator will be able to approve or deny those access requests from others in your company or from outside Data Providers.

This information is also available through online training modules which can be found on the NetDMR Support page at the following web address:

https://netdmr.zendesk.com/entries/44942194-Training-Materials

If you have any further questions about using NetDMR please feel free to email us at R1.NetDMR@epa.gov or contact one of the following individuals:

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Diane Boisclair: (617) 918-1762 or boisclair.diane@epa.gov

Marie McDonald (617) 918-1878 or mcdonald.marie@epa.gov

Neil Handler: (617) 918-1334 or handler.neil@epa.gov

Ed Kim: (617) 918-1945 or <u>kim.ed@epa.gov</u>

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